

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon for Authorization)	
Under Section 271 of the Communications)	
Act to Provide In-Region, InterLATA)	WC Docket No. 02-214
Services in the State of Virginia)	
_____)	

DECLARATION OF SHERRY LICHTENBERG

1. My name is Sherry Lichtenberg. I have twenty years of experience in the telecommunications market. Prior to joining WorldCom, Inc., I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management. I have been with WorldCom, Inc. for six years. I am currently employed by WorldCom, Inc. as a Senior Manager in the Mass Markets local services team. My duties include designing, managing, and implementing WorldCom's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing in Verizon and elsewhere. I have been involved in OSS proceedings throughout the country.

2. WorldCom entered the local residential market in Virginia in April 2002 in partnership with Z-Tel. WorldCom placed all of its orders through Z-Tel's OSS, and Z-Tel received the wholesale bills. On August 1, WorldCom began placing orders through its own OSS and will now receive wholesale bills itself. It is vital that these bills are accurate and

auditable. It is also vital that Verizon follow its change management process. Unfortunately, it appears that neither is likely.

BILLING

3. WorldCom continues to experience significant billing problems in Pennsylvania, another Verizon-South state, despite the fact that Verizon claimed that it had corrected its billing problems by the time this Commission approved its section 271 application for that state.

Although Verizon's back-end billing systems in Virginia are not identical in all respects to those in other Verizon-South states such as Pennsylvania, it is likely that the format of the bills is the same and that WorldCom will experience the same problems in Virginia that it is experiencing in Pennsylvania. Indeed, it is WorldCom's understanding that Z-Tel is experiencing just such problems in Virginia.

4. WorldCom continues to encounter three major problems with Verizon's billing. First, Verizon is not populating the ANI field in the Other Charges & Credits (OC&C) section of the bill. Second, Verizon does not break out or identify the credits on bills. Third, Verizon's dispute filing process for wholesale accounts is time-consuming and cumbersome, and Verizon considers its decisions on claims final without exhausting the claims process.

Verizon Is Not Populating the ANI Field in the Other Charges & Credits (OC&C) Section of the Bill

5. An ANI is the customer telephone number. The Other Charges and Credits (OC&C) section of the bill is meant to provide detailed billing information on the individual telephone number level for each feature (identified by a USOC code) that WorldCom orders for its customers. This section of the bill is also where all the non-recurring, one-time, and miscellaneous charges and credits are listed. There is a field on this section of the bill where the

ANI, or telephone number, is supposed to be filled in. However, Verizon is not filling that field in on the bills.

6. In order to properly audit the bill, individual charges must be associated with a particular customer's telephone number. Otherwise, it is impossible to determine whether we are being billed properly because we cannot match these charges and credits to the specific customer. It is also important that we are able to verify these non-recurring charges because they allow us to trend charge information to ensure that customer totals are correct and that Verizon is providing us with correct and timely install and disconnect information.

7. In the Verizon-North states, such as New York, Verizon populates the ANI field of the OC&C section of the bill. Verizon does not do this in its Southern region and we have no expectation that they will do so in Virginia. There is no legitimate reason for Verizon not to populate this field in the bills sent for Verizon-South states, and the failure to do so severely limits WorldCom's ability to audit the bills.

Verizon Does Not Break Out or Identify the Credits on Bills

8. The way Verizon lists credits on the bills makes it difficult, if not impossible, for WorldCom to verify what the credits are for. It also makes it impossible to ensure that Verizon has properly credited us for previously agreed-upon amounts.

9. Verizon puts credits on the bill without any reference to a claim number and without text describing the reason for the credit. Thus, there is no way to associate the credit with a prior claim made by WorldCom and no way to determine what the credit is for. This makes it impossible to track our claims and ensure that they have been properly addressed.

10. The normal industry practice is to make the credits easily identifiable. WorldCom prefers that the credits be put under one section of the bill. We are mindful of Verizon's concern

that some credits are system generated and can only be put on the OC&C section of the bill. However, we need all credits to be specifically identified for auditing purposes. Verizon is providing identifiable credits on its Access bills and on some of its local bills, but not on our UNE-P billing in the Verizon-South region. It is unclear why Verizon cannot provide identifiable credits consistently across its billing platforms.

11. Even if Verizon were to place the claim number next to a credit, that would not go far enough. Not all credits are associated with a claim submitted by WorldCom. Thus, in addition to identifying the specific claim number where applicable, Verizon should put text on the bill with the credit so that the credit is identifiable, and so that WorldCom knows what each credit is for.

12. Finally, the tedious and frustrating effort to get in touch with a live Verizon claims representative makes it difficult to get timely answers regarding credit related questions.

Verizon's Dispute Filing Process for Wholesale Accounts Is Time-Consuming and Cumbersome, and Verizon Considers Its Decisions on Claims Final without Exhausting the Claims Process.

13. Verizon's dispute filing process for wholesale accounts is time consuming and cumbersome. For example, Verizon has a standardized form that does not provide a complete list of all dispute reasons. Verizon also requests that all disputes include attachments of the individual component accounts. Since Verizon sometimes fails to provide us with these component accounts on the bills (as indicated above with the OC&C not populating these accounts), this is often impossible and leads to a return of the dispute and the need to start the process all over again. Depending on the dollar amount of the claim/dispute, this could entail tens of thousands of component accounts. Moreover, there is no place on the standard dispute form to accommodate this mandate.

14. Verizon has rejected some of our claims and requested a re-submittal because of the technicalities of filling out the paperwork, rather than the merit of the claims. Resubmission takes additional resources. This is especially so because it is very difficult to get in touch with a live claim processor to answer questions about claims (either before submitting them in the first place or after they have been rejected). A CLEC must call into a toll free number and leave a call back number.

15. Finally, Verizon always assumes that when it denies a claim, we should accept their verdict without exhausting the claim process as stipulated in our Interconnection Agreement (see Billing Disputes in Att. 8, Section 3.1.9). Verizon should modify its dispute filing process so that claims can be easily submitted and accepted. Further, there should be an easier way to make calls regarding billing inquiries. Finally, Verizon should not deem itself judge and jury on billing dispute issues, and should not close out an issue until all parties agree that the issue has been resolved.

16. Accurate bills are critical to WorldCom's viability and ability to compete. Because the amount owed to Verizon is the primary cost of providing residential service for WorldCom, it is imperative that Verizon's bills are auditable and accurate, and that Verizon's procedures for handling billing disputes support the needs of its customers and resolve issues rapidly and correctly.

VERIZON HAS DEVIATED FROM ITS CHANGE MANAGEMENT PROCESS

17. I have long maintained that Verizon's change management process, and especially its implementation of that process, is the best in the country. It appears that this is no longer the case, however. Verizon recently implemented new code region-wide without discussing the change in change management or even providing any notification to CLECs. The

code was designed to allow Verizon to reject orders of CLECs that Verizon had concluded were behind in their payments. This issue is of particular concern to WorldCom especially since WorldCom's interconnection agreements do not give Verizon authority to cut off service in this fashion without meeting the conditions in our agreements.

18. After an emergency meeting with CLECs in New York, Verizon agreed that it had violated the change management process in implementing this code. Verizon therefore agreed that it would not employ the new code without first going through change management. But Verizon stated that it could not pull the code back out of its systems.

19. Apparently, Verizon now believes that it can get away with making changes that are important to it outside the boundaries of the change management process. That this is not the case should be emphasized by denial of this section 271 application.

CONCLUSION

This concludes my declaration on behalf of WorldCom.